

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 04-CR-10031-WGY
JAMES E. REID,)	
Defendant.)	
_____)	

JOINT MOTION TO CONTINUE TRIAL DATE

The United States of America, by and through Assistant U.S. Attorney Victor A. Wild, and the defendant by and through his counsel, Syrie D. Fried, Esq., jointly move this Court for an Order continuing the trial in the captioned criminal case from December 12, 2005, to January 23, 2006, or in the alternative to April, 2006, as may be convenient for this Court. As reasons for this joint motion, the parties submit the following:

1. Government counsel has been engaged in the six-defendant trial of United States v. Mazzola, et al., Criminal No. 01-10012-RGS, since October 17, 2005. The trial was originally estimated to last three to four weeks. It now appears in light of Veterans Day holiday and another matter requiring suspension of trial for one day, that the Government's case-in-chief alone will last beyond November 18, 2005. The defendants have identified more than two dozen witnesses, not including the six defendants, as persons they intend to call at trial. It now appears in light of Thanksgiving holiday and the following one

day suspension of the trial, that the trial will not likely be completed before the end of November 2005, and may extend into December 2005. Due to commitment of Government counsel to the trial of Mazzola, et al., Government counsel needs additional time to assure that all pre-trial matters are completed, to coordinate with witnesses from Canada for preparation of trial testimony and to arrange for their international travel under DOJ procedures, and to prepare for efficient trial of the captioned criminal case.

2. Defense counsel recently obtained approximately 1800 pages of additional discovery which she must review. The total discovery received from the government thus far runs in excess of 5000 pages. The defendant has not reviewed most of these papers personally because he lives in Canada. Meetings between counsel and the defendant are not easy to arrange because the border authorities must be involved and have to parole Mr. Reid into the country; thus these meetings must be scheduled at least two weeks in advance of their actually taking place. Counsel has planned a meeting with Mr. Reid to take place in the next week so that he can review documents and prepare for trial. However, counsel needs more meetings with Mr. Reid in order to prepare properly. Finally, counsel's trial schedule has been very full and has prevented her from devoting her undivided attention to this

matter. Counsel has had three jury trials since late July:
United States v. Matthew Dwinells, which began July 25, United
States v. Trevis Catron, which began September 12, and United
States v. Girard Lafortune, which began October 31.

For these reasons counsel jointly request a continuance of
the trial.

Respectfully submitted this 14th day of November, 2005.

JAMES E. REID
Defendant

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Syrie D. Fried
SYRIE D. FRIED, Esq.
Counsel for defendant Reid

By: /s/ Victor A. Wild
VICTOR A. WILD
Assistant U.S. Attorney